

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 16-cr-20732-RHC

vs.

Hon. Robert H. Cleland

DEAN REYNOLDS,

Defendant.

**EX PARTE MOTION FOR APPOINTMENT  
OF COUNSEL UNDER THE CRIMINAL JUSTICE ACT 18 U.S.C. § 3006(A)**

NOW COMES the Defendant, DEAN REYNOLDS, by and through his attorney, Stephen T. Rabaut, and pursuant to the Criminal Justice Act, 18 USC §3006(a), moves this Honorable Court for entry of an Order appointing Stephen T. Rabaut as his court appointed counsel for the remainder of this case.

1. The undersigned has represented the Defendant since October 13, 2016, the date of his initial arrest in the within matter.
2. Defendant has paid the undersigned counsel \$40,000.00.
3. That the within matter involves an enormous amount of discovery and extensive pretrial preparation.
4. Defendant is indigent and can no longer pay legal fees.

5. Defense counsel and his client both request that the Court appoint the undersigned as counsel from May 23, 2018 and for the duration of this case.

Respectfully requested,

/s/ Stephen T. Rabaut  
STEPHEN T. RABAUT (P 31143)  
Attorney for Defendant  
16931 19 Mile Road, Ste. 100  
Clinton Township, MI 48038  
(586) 263-1600  
[srabautlaw@me.com](mailto:srabautlaw@me.com)

Dated: May 24, 2018

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 16-cr-20732-RHC

vs.

Hon. Robert H. Cleland

DEAN REYNOLDS,

Defendant.

**MEMORANDUM OF LAW IN SUPPORT OF**  
**IN CAMERA MOTION FOR APPOINTMENT OF COUNSEL**  
**UNDER THE CRIMINAL JUSTICE ACT 18 U.S.C. § 3006**

In support of his Motion, Defendant, Dean Reynolds, relies on Criminal Justice Act 18 U.S.C. (A), which provides at Section (c) Duration . . . of appointments, that . . . if at any stage of the proceedings . . . the Court finds that the person is financially unable to pay counsel whom he has retained, it may appoint counsel.

WHEREFORE, Defendant prays that this Honorable Court grant his request and appoint the undersigned as counsel for the duration of this case.

Respectfully requested,

/s/ Stephen T. Rabaut  
STEPHEN T. RABAUT (P 31143)  
Attorney for Defendant  
16931 19 Mile Rd., Ste. 100  
Clinton Township, MI 48038  
(586) 263-1600  
[srabautlaw@me.com](mailto:srabautlaw@me.com)

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Hon. Robert H. Cleland

**ORDER APPOINTING STEPHEN T. RABAUT AS CJA COUNSEL**

The Court having read Defendant's In Camera and Ex Parte Motion to Appoint Counsel of Record under the Criminal Justice Act 18 U.S.C. § 3006(a), and being fully apprised in the premises;

IT IS HEREBY ORDERED that Stephen T. Rabaut is appointed as CJA counsel to represent Defendant, Dean Reynolds, *nunc pro tunc* to May 23, 2018.

S/Robert H. Cleland  
ROBERT H. CLELAND  
UNITED STATES DISTRICT JUDGE

Dated: June 13, 2018

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, June 13, 2018, by electronic and/or ordinary mail.

S/Lisa Wagner  
Case Manager and Deputy Clerk  
(810) 292-6522